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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	2:15-cr-00266-APG-VCF-3
Plaintiff,)	
)	
v.)	<u>STIPULATION TO CONTINUE</u>
)	<u>MOTIONS AND NOTICES OF</u>
SUSAN COPE,)	<u>DEFENSE DEADLINE ONLY</u>
)	(Ninth Request)
Defendant.)	

IT IS HEREBY STIPULATED by and between Jason M. Frierson, United States Attorney, as well as Jean N. Ripley, Assistant United States Attorney, Counsel for the United States of America; and Angela H. Dows, Esq., counsel for Defendant SUSAN COPE, that the pretrial motions and notices of defense deadline, currently set for May 30, 2022 be continued for a period of sixty (60) days, to on or before July 29, 2022. The instant stipulation is not intended to request a continuance of the current calendar call and trial dates of September 6, 2022, and September 12, 2022, respectively.

This is the ninth overall request for a continuance in this case, and/however the second request by instant counsel for Defendant SUSAN COPE. This Stipulation is entered into based upon the following:

1. In May of 2022, Defendant Susan Cope submitted an application for the District of Nevada's RISE Court. The results of said application are anticipated in or around the middle part of June, 2022. The results of said application will also likely dictate what Defendant Susan Cope intends to do in the case overall.
2. Instant appointed counsel Angela H. Dows substituted into the case in January of 2022, and has reviewed the documentary evidence in the case, and is awaiting the results of the RISE Court application prior to any additional trial evidence review and/or compilation (i.e. the several audio recordings underlying the written summaries already reviewed).
3. Instant counsel would like to be able to review the results of the RISE Court application prior to the preparation and filing of pretrial motions and/or notices of defense.
4. The instant stipulation does not currently request a continuance of trial dates in light of the brief continuance requested to the motions and notices of defense deadline.
5. That counsel for Defendant has conferred with her client, who is out of custody and, moreover, does not object to the requested continuance.
6. That the additional time requested herein is not sought for purposes of delay, but merely to allow the parties sufficient time by which to investigate, research, respond and litigate any pretrial motions and/or defenses deemed necessary prior to trial, and after the results of the RISE Court application.
7. The additional time requested by this stipulation does not request an extension of the time of trial. The period requested to continue the matter serves the ends of justice and outweighs the best interest of the public and the defendant in a speedy

trial pursuant to the Speedy Trial Act, specifically 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B).

8. Pursuant to 18 U.S.C. § 3161(h)(7)(B)(i) and (ii) denial of this request for continuance would result in a miscarriage of justice, as additional time is needed by which to effectively and thoroughly research and prepare for trial within the time limits established by 18 U.S.C. §3161, taking into account the exercise of due diligence.

9. For all the above-stated reasons, the ends of justice would best be served by a brief continuance of the pretrial motions and notices of defense deadline.

DATED this 25th day of May, 2022.

JASON M. FRIERSON
United States Attorney
By: /s/ Jean N. Ripley
JEAN N. RIPLEY
Assistant United States Attorney
Counsel for Plaintiff

CORY READE DOWS & SHAFER
By: /s/ Angela H. Dows
ANGELA H. DOWS, ESQ.
Appointed Counsel Defendant
Susan Cope

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
) 2:15-cr-00266-APG-VCF-3
Plaintiff,)
)
v.) **FINDINGS OF FACT,**
) **CONCLUSIONS OF LAW, AND**
SUSAN COPE,) **ORDER THEREON**
)
Defendant.)
_____)

FINDINGS OF FACT

Based on the pending Stipulation of the parties, and good cause appearing therefore, the Court finds that:

1. Defense counsel requires a continuance of the motions and notices of defense deadline in order to review the results of the RISE Court application, of which said results are anticipated in approximately the middle of June, 2022.

2. The parties also request additional time to effectively represent their clients in appropriately preparing the case for trial, and thus request an extension of the trial date and related calendar call date.

3. Defendant is out of custody, and does not object to the continuance.

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CONCLUSIONS OF LAW

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2 1. The additional time requested by this stipulation does extend the time of trial.
3 The period was previously found excludable in computing the time within which the trial herein
4 must commence pursuant to the Speedy Trial Act, specifically 18 U.S.C. § 3161(h)(7)(A) and
5 (h)(7)(B).

6 2. Denial of this request for continuance would result in a miscarriage of justice, as
7 additional time is needed by which to review the case, in a case involving charges of Conspiracy
8 to Distribute a Controlled Substance (Oxycodone) pursuant to 21 U.S.C. § 846.
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10 3. Denial of this request for continuance would also deny the parties herein
11 sufficient time and the opportunity within which to effectively and thoroughly research and
12 prepare for trial within the time limits established by 18 U.S.C. §3161, taking into account the
13 exercise of due diligence. For the above-stated reasons, the ends of justice would best be served
14 by a continuance, and such continuance outweighs the best interests of the public and the
15 defendants in a speedy trial.
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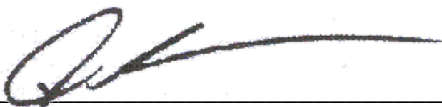
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ORDER

IT IS THEREFORE ORDERED that the parties shall have to and including July 29, 2022 within which to file any and all pretrial motions and notices of defense.

IT IS SO ORDERED.

Dated: May 26th, 2022.


UNITED STATES DISTRICT JUDGE